

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

§

v.

§

CASE NO. 4:21cr024

ZAHRA BADRI

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DEFENDANT BADRI'S UNOPPOSED MOTION TO TRAVEL

Comes now, Defendant ZAHRA BADRI, through undersigned counsel, and files this (Un)opposed Motion to Travel, and in support thereof would show the Court the following:

1. Defendant Badri is charged in a 1 count indictment with female genital mutilation (“FGM”) in violation of 18 U.S.C. §116(d) (2013).
2. On January 27, 2021, Defendant Badri was released pending trial on a \$15,000 unsecured bond. As part of her release, an Order Setting Condition of Release was entered restricting Defendant’s travel to the Southern District of Texas.
3. Defendant Badri has faithfully abided by all conditions of her bond.
4. Defendant Badri would like to travel to Mombasa, Kenya and Upanga Dar Salaam, Tanzania from May 11, 2022 to May 19, 2022 to visit her son and other family members in Tanzania and her grandmother in Kenya. Defendant Badri will be traveling alone on KLM and Lufthansa Airlines and staying with family members. She may be reached electronically at all times via an app on her cell phone.
5. Defendant Badri was previously allowed to travel to Iraq by Order dated April 30, 2021 (see Dkt. 14) and returned.
6. Defendant Badri will temporarily need her U.S. passport in order to take this trip (Defendant Badri surrendered her U.S. and British passports to the Clerk as a condition of her pretrial release).

WHEREFORE, Defendant Badri requests that this Court grant her permission to travel to Mombasa, Kenya and Upanga Dar Salaam, Tanzania from May 11, 2022 to May 19, 2022.

Respectfully submitted,

/s/ Richard Kuniansky
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ATTORNEY FOR DEFENDANT
ZAHRA BADRI

CERTIFICATE OF CONFERENCE

IT IS HEREBY CERTIFIED that On May 9, 2022, undersigned counsel conferred with Assistant United States Attorney Kimberly Ann Leo who stated she is unopposed to the granting of this motion and confirmed that United States Pretrial Services Officer Tiffani Dabney is unopposed to the granting of this motion.

/s/ Richard Kuniansky
Richard Kuniansky

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing MOTION TO TRAVEL has this 9th day of May, 2022 been made by electronic means to the following:

Ms. Kimberly Ann Leo
Ms. Sherri Zack
Assistant U.S. Attorney
1000 Louisiana, Suite 2300
Houston, Texas 77002

/s/ Richard Kuniansky
Richard Kuniansky

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

v.

§

CASE NO. 4:14cr171

ZAHRA BADRI

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ORDER

Defendant ZAHRA BADRI's bond is modified to allow her to travel to Mombasa, Kenya and Upanga Dar Salaam, Tanzania from May 11, 2022 to May 19, 2022.

The Clerk is ordered to return Defendant Badri's U.S. passport to her. Defendant Badri is ordered to surrender the passport to the Clerk within 48 hours of her return to the U.S.

SIGNED this ____ day of May, 2022.

Honorable Alfred H. Bennett
United States District Judge